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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PUGET SOUNDKEEPER ALLIANCE,	)	
	)	
Plaintiff,	)	
v.	)	COMPLAINT
	)	
RAINIER PETROLEUM	)	
CORPORATION,	)	
	)	
Defendant.	)	
	)	

**I. INTRODUCTION**

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff Puget Soundkeeper Alliance seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for Defendant Rainier Petroleum Corporation’s repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES”) permit authorizing discharges of pollutants from Defendant’s Seattle, Washington, “Colorado Street” facility to navigable waters.

COMPLAINT - 1

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## II. JURISDICTION AND VENUE

2. The Court has subject matter jurisdiction over Plaintiff's claims under Section 505(a) of the CWA, 33 U.S.C. § 1365(a). Sections 309(d) and 505(a) and (d) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a) and (d) authorize the relief Plaintiff requests.

3. Under Section 505 (b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Plaintiff notified Defendant of Defendant's violations of the CWA and of Plaintiff's intent to sue under the CWA by letter dated April 1, 2014 and delivered April 2, 2014. A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations in the Notice Letter are incorporated herein by this reference. Plaintiff notified the Defendant's Registered Agent, the Administrator of the United States Environmental Protection Agency ("USEPA"), the Administrator of USEPA Region 10, and the Director of the Washington Department of Ecology ("WDOE") of its intent to sue Defendant by mailing copies of the Notice Letter to these officials on April 1, 2014.

4. More than sixty days have passed since the notice letter was served and the violations complained of in the notice letter identified *infra* are continuing or are reasonably likely to continue to occur. Defendant is in violation of its NPDES permit, and the CWA. Neither the USEPA nor the WDOE has commenced any action constituting diligent prosecution to redress these violations.

5. The source of the violations complained of is located in King County, Washington, within the Western District of Washington, and venue is therefore appropriate in the Western District of Washington pursuant to Section 505(c)(1) of the CWA, 33 U.S.C. § 1365(c)(1), and 28 U.S.C. § 1391(b).

## III. PARTIES

6. Plaintiff, Puget Soundkeeper Alliance, is suing on behalf of itself and its member(s). Puget Soundkeeper Alliance is a non-profit corporation registered in the State of

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1 Washington. Puget Soundkeeper Alliance is a membership organization and has at least one  
2 member who is injured by Defendant's violations. Puget Soundkeeper Alliance is dedicated to  
3 protecting and preserving Puget Sound by tracking down and stopping toxic pollution entering  
4 its waters.

5 7. Plaintiff has representational standing to bring this action. Puget Soundkeeper  
6 Alliance's members are reasonably concerned about the effects of excess discharges of metals,  
7 from Defendant's facility on aquatic species and wildlife that Plaintiff's members observe and  
8 enjoy. In addition, excess discharges of metals from Defendant's facility lessen Puget  
9 Soundkeeper Alliance's members' aesthetic enjoyment of nearby areas. As a result, Puget  
10 Soundkeeper Alliance's members use the Duwamish River, Elliott Bay, and the area near  
11 Defendant's facility less than they otherwise would. The recreational, economic, aesthetic  
12 and/or health interests of Puget Soundkeeper Alliance and its member(s) have been, are being,  
13 and will be adversely affected by Defendant's violations of the CWA. The relief sought in this  
14 lawsuit can redress the injuries to these interests.

15 8. Plaintiff has organizational standing to bring this action. Plaintiff has been  
16 actively engaged in a variety of educational and advocacy efforts to improve water quality and to  
17 address sources of water quality degradation in the waters of Puget Sound and its tributaries,  
18 including significant efforts specific to the Duwamish Waterway and Elliott Bay. Defendant has  
19 failed to fulfill monitoring, recordkeeping, reporting and planning requirements, among others,  
20 necessary for compliance with its NPDES permits and the CWA. As a result, Plaintiff is  
21 deprived of information necessary to properly serve its members by providing information and  
22 taking appropriate action, and Plaintiff's efforts to educate and advocate for greater  
23 environmental protection for the benefit of its members are obstructed. Plaintiff and the public

are deprived of information that influences members of the public to become members of Puget Soundkeeper Alliance, thereby reducing Puget Soundkeeper Alliance's membership numbers. Thus, Plaintiff's organizational interests have been adversely affected by Defendant's violations. These injuries are fairly traceable to Defendant's violations and redressable by the Court.

9. Defendant is a Washington corporation authorized to conduct business under the laws of the State.

10. Defendant owns and operates a petroleum bulk station, terminal, and storage facility located at or about 3429 Colorado Avenue South and 40 South Spokane Street, (the "Colorado Street Facility" or "Facility").

#### IV. LEGAL & FACTUAL BACKGROUND

##### The Affected Community & Environment

11. The lower Duwamish River is highly important ecologically and culturally for the surrounding community and for the Puget Sound region as a whole. The Duwamish River forms the lower reaches and mouth of the Green River Watershed and the area supports populations of seven salmon and trout species including endangered Chinook salmon, steelhead and bull trout, as well as cutthroat trout, pink salmon, chum salmon and Coho salmon. It is an important seabird, waterfowl and raptor area with blue heron, green heron, cormorants, pigeon guillemot, mergansers, bufflehead, scaup, western grebe, kingfisher, osprey and bald eagle making use of marginal but available habitat. River otters, harbor seals and California sea lions also use the river as habitat and for feeding.

12. The lower Duwamish River is the traditional home of the Duwamish Tribe, and includes the communities of Georgetown, South Park, Tukwila and West Seattle. Although

1 heavily impacted by industrial pollution, the community of the Lower Duwamish River Valley is  
2 in a state of renewal.

3 13. The Lower Duwamish Waterway, a 5.5 mile stretch of the Duwamish Waterway  
4 into which Defendant's Colorado Street Facility contributes pollutants, is on the National  
5 Priorities List for Superfund cleanup.  
6

7 14. The community takes an active role in the recovery and cleanup of the river,  
8 participating in citizen oversight of the Superfund cleanup and numerous restoration projects  
9 along the river. An annual river festival is held in the area. New shoreline access points have  
10 increased recreational use and improved appreciation of the river's remaining natural  
11 characteristics.  
12

13 15. Washington State and local health departments warn against eating crab, shellfish,  
14 or bottom-feeding fish from the Lower Duwamish Waterway, due to contamination.  
15

16 16. The Lower Duwamish has a long tradition of seafood production. Despite  
17 warnings about the safety of seafood, some members of the community still use the river for  
18 sustenance and recreation including the taking of salmon, shellfish and bottom-dwelling fish.  
19

20 17. Direct exposure to the water, sediments and contamination in the Lower  
21 Duwamish Waterway poses a health risk to humans.  
22

23 18. Disease risk is higher in Duwamish River communities and life expectancy is  
24 lower than other communities in the region.  
25

26 19. Contamination in the Lower Duwamish Waterway has an adverse effect on  
27 animals that live in its sediments and mud, such as worms, clams, and other invertebrates, and  
28 poses a risk of adverse affects on river otters and other wildlife. Contaminated organisms enter  
29 the food chain and can harm animals throughout the river and Puget Sound.

1           20.     Contamination in the Lower Duwamish Waterway has an adverse effect on  
2 animals that live in its sediments and mud, such as worms and clams, and poses a risk of adverse  
3 effects on river otters and other wildlife.

4           21.     The Duwamish Waterway is listed on WDOE's 303(d) list of impaired  
5 waterbodies for several pollutant parameters, including dissolved oxygen, bacteria, and  
6 ammonia-nitrogen in the water column; PCBs, dieldrin, and carcinogenic or high molecular  
7 weight polycyclic aromatic hydrocarbons (cPAH or HPAH) in fish tissue; and several toxic  
8 pollutants, including arsenic, cadmium, chromium, copper, lead, mercury, silver, zinc, PCB,  
9 HPAH, benzenes, phenols, phthalates, in sediments.

10           22.     Elliott Bay is listed on WDOE's 303(d) list of impaired waterbodies for several  
11 pollutants, including fecal coliform in the water column, and arsenic, cadmium, chromium,  
12 copper, lead, mercury, silver, zinc, low molecular weight polycyclic aromatic hydrocarbons  
13 (LPAH), PCB, benzenes, phthalates, and phenols in sediments.

14           23.     Central Puget Sound is listed on WDOE's 303(d) list of impaired waterbodies for  
15 several pollutant parameters, including fecal coliform in the water column, and PCB and dioxin  
16 in fish tissue.

17           24.     The vicinity of the Facility, the Duwamish River, Elliott Bay and Puget Sound are  
18 used by the citizens of Washington and visitors, as well as at least one of Plaintiff's members, for  
19 recreational activities, including boating, biking, fishing and nature watching. Plaintiff  
20 member(s) also derive(s) aesthetic benefits from the receiving waters. Plaintiff's and its  
21 members' enjoyment of these activities and waters is diminished by the polluted state of the  
22 receiving waters, shorelines, and the nearby areas, and by Defendant's contributions to such  
23 polluted state.

**Legal Background**

25. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. Section 301(a) prohibits, inter alia, such discharges not authorized by, or in violation of, the terms of a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

26. The State of Washington has established a federally approved state NPDES program administered by the WDOE. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the USEPA pursuant to 33 U.S.C. § 1342(b).

27. Pursuant to Section 402(a) of the CWA, 33 U.S.C. § 1342(a), the WDOE has repeatedly issued Industrial Stormwater General Permits, the current iteration having been issued on October 21, 2009, with modifications made effective July 1, 2012 (the “General Permit”). The General Permit, in its various iterations since its first issuance in 1993 containing comparable requirements, authorizes those that obtain coverage under the General Permit to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to the waters of the State subject to certain terms and conditions.

28. The General Permit imposes certain terms and conditions on those covered thereby, including monitoring and sampling of discharges, reporting and recordkeeping requirements, as well as restrictions on the quality of stormwater discharges. To reduce and eliminate pollutant concentrations in stormwater discharges, the General Permit requires, among other things, that permittees develop and implement best management practices (“BMPs”) and a Stormwater Pollution Prevention Plan (“SWPPP”), and apply AKART to discharges. When a

Permittee's stormwater discharge exceeds benchmark values for concentrations of certain pollutants (and action levels for concentrations of certain pollutants in a previous version of the General Permit), the General Permit requires the Permittee to complete the applicable Level 1, 2, or 3 corrective action requirements. The specific terms and conditions of the General Permit are described in detail in the Notice Letter, attached hereto as Exhibit 1 and incorporated herein by this reference.

### **Colorado Street Facility**

29. Pursuant to Condition S2 of the General Permit, Defendant filed with the WDOE an Application for General Permit to Discharge Stormwater Associated with Industrial Activity. WDOE granted Defendant coverage under the General Permit for Defendant's Colorado Facility under Permit Number WAR005619.

30. Defendant's Colorado Street Facility is engaged in industrial activity, including storage and distribution of lubricating oil, and discharges stormwater associated with industrial activity and other pollutants to the Duwamish Waterway.

31. Defendant discharges stormwater from the Colorado Street Facility in excess of the General Permit benchmarks each day during which there is 0.1 inch or greater precipitation, including the days on which it collected samples identified in Table 1:

**Table 1**

Quarter in which sample was collected	Zinc concentration	Copper concentration
4th Quarter 2009	144	
2nd Quarter 2012	302	16.2
3rd Quarter 2013		15.3



1  
2 32. The stormwater samples identified in Table 1 are representative of and accurately  
3 characterize the quality of stormwater discharges generated by the Colorado Street Facility  
4 during the associated calendar quarter.

5 33. Defendant has violated the General Permit and Sections 301(a) and 402 of the  
6 CWA, 33 U.S.C. §§ 1311(a) and 1342, by discharging pollutants from its Colorado Street  
7 Facility in violation of an NPDES Permit. In particular and among the other violations described  
8 in the Notice Letter attached as Exhibit 1, Defendant has caused or contributed to violations of  
9 water quality standards for zinc and copper in the Duwamish Waterway, including every day  
10 Defendant discharged pollutant concentrations in excess of the General Permit benchmarks.  
11 Further, Defendant has failed to (a) implement best management practices that constitute all  
12 known, available, and reasonable methods of prevention, control, and treatment for stormwater  
13 discharges; (b) implement BMPs to control stormwater quality as required by the General  
14 Permit, including storing materials and conducting activities under a storm resistant cover,  
15 erosion controls, and stormwater treatment BMPs; (c) prepare a stormwater pollution prevention  
16 plan that specifies adequate pollution controls; (d) provide Plaintiff access to a copy of  
17 Defendant's stormwater pollution prevention plan; (e) take timely corrective actions in response  
18 to excursions of the General Permit benchmarks for zinc and copper; (f) collect and submit  
19 quarterly discharge monitoring information in at least twenty quarters; (g) submit complete  
20 annual reports; and (h) sample each distinct point of discharge or document why doing so is  
21 unnecessary;  
22

23 34. Defendant triggered Level 1 corrective action requirements for each benchmark  
24 exceedance identified in Table 1 but failed to complete each and every Level 1 corrective action.  
25

1 35. Discharges from Defendant's Colorado Street Facility, including discharges of  
2 metals, contribute to the ecological impacts that result from the polluted state of the Duwamish  
3 Waterway and Puget Sound, and to Plaintiff's and its members' injuries resulting therefrom.

4 36. Defendant has benefited economically as a consequence of its violations and its  
5 failure to implement stormwater management improvements at the Facility.  
6

7 37. Defendant's violations of the CWA at the Facility degrade the environment and  
8 the water quality of the receiving water bodies.

9 38. Defendant's violations at the Facility were avoidable had Defendant been diligent  
10 in overseeing facility operations and maintenance.  
11

12 39. Defendant has a history of significant violations similar to those alleged herein, at  
13 the Facility and other facilities it operates.

14 40. A significant penalty should be imposed against Defendant pursuant to the  
15 penalty factors set forth in 33 U.S.C. § 1319(d).  
16

17 41. Defendant and defendant's parent company are profitable business enterprises.  
18 Defendant can afford to pay a significant penalty and such penalty is required to meet the  
19 deterrence goals of the Clean Water Act's penalty factors and to disgorge Defendant of the  
20 economic advantage it has received through its avoidance of expenditures necessary for  
21 compliance.  
22

## 23 **V. CAUSE OF ACTION**

24 42. The preceding paragraphs and the allegations in the Notice Letter are incorporated  
25 herein.  
26

27 43. Defendant has violated the General Permit.  
28

1           44. Defendant's violations of the General Permit described herein and in the Notice  
2 Letter constitute violations of sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342,  
3 and violations of "effluent standard(s) or limitation(s)" as defined by section 505, 33 U.S.C. §  
4 1365.

5           45. On information and belief, the violations committed by Defendant are ongoing or  
6 are reasonably likely to continue to occur. Any and all additional violations of the General  
7 Permit and the CWA which occur after those described in Plaintiff's Notice Letter but before a  
8 final decision in this action should be considered continuing violations subject to this Complaint.  
9

10           46. Without the imposition of appropriate civil penalties and the issuance of an  
11 injunction, Defendant is likely to continue to violate the General Permit and the CWA to the  
12 further injury of the Plaintiff, its member(s) and others.  
13

14           47. A copy of this Complaint is being served upon the Attorney General of the United  
15 States and the Administrator of the USEPA as required by 33 U.S.C. § 1365(c)(3).  
16

17                           **VI. RELIEF REQUESTED**

18           Wherefore, Plaintiff respectfully requests that this Court grant the following relief:

19           A. Issue a declaratory judgment that Defendant has violated and continues to be in  
20 violation of the General Permit, and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and  
21 1342;  
22

23           B. Enjoin Defendant from operating the Facility in a manner that results in further  
24 violations of the General Permit, and the CWA;

25           C. Order Defendant to immediately implement a plan for achieving compliance with  
26 the CWA at the Facility, and to provide Plaintiff with a copy of the plan;  
27  
28

1 D. Order Defendant to allow Plaintiff to participate in the development and  
2 implementation of Defendant's plan to achieve compliance with the CWA;

3 E. Order Defendant to provide Plaintiff, for a period beginning on the date of the  
4 Court's Order and running for three years after Defendant achieves compliance with all of the  
5 conditions of the General Permit, with copies of all reports and other documents which  
6 Defendant submits to the USEPA or to the WDOE regarding Defendant's coverage under the  
7 General Permit at the Facility at the time it is submitted to these authorities;  
8

9 F. Order Defendant to take specific actions to remediate the environmental harm  
10 caused by its violations;  
11

12 G. Order Defendant to pay civil penalties of \$37,500.00 per day of violation for each  
13 violation committed by Defendant pursuant to Sections 309(d) and 505(a) of the CWA, 33  
14 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19;

15 H. Award Plaintiff its litigation expenses, including reasonable attorneys' and expert  
16 witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d), and any other  
17 applicable authorization; and  
18

19 I. Award such other relief as this Court deems appropriate.

20 RESPECTFULLY SUBMITTED this 6th day of June, 2014.

21  
22 **SMITH & LOWNEY, PLLC**

23 By: /s/Knoll D. Lowney  
Knoll D. Lowney, WSBA No. 23457

24 By: /s/ Claire E. Tonry  
Claire E. Tonry, WSBA No. 44497

25  
26 Attorneys for Plaintiff  
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# Exhibit 1

**SMITH & LOWNEY, P.L.L.C.**

2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883, FAX (206) 860-4187

April 1, 2014

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Rainier Petroleum Corporation  
1711 13<sup>th</sup> Ave SW  
Seattle, WA 98134-1009

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION  
PLAN FOR RAINIER PETROLEUM'S COLORADO STREET FACILITY**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance ("Soundkeeper"), 5305 Shilshole Ave. NW, Suite 150, Seattle, WA 98107, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Soundkeeper's intent to file a citizen suit against Rainier Petroleum Corporation ("Rainier Petroleum") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Rainier Petroleum's National Pollution Discharge Elimination System ("NPDES") permit.

Rainier Petroleum was granted coverage effective January 18, 2005 under Washington's Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") on August 21, 2002, effective September 20, 2002, modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under National Pollutant Discharge Elimination System Permit No. SO3-005619 (the "2002 Permit"). Rainier Petroleum was granted coverage under the subsequent iteration of the Washington Industrial Stormwater General Permit issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under National Pollutant Discharge Elimination System Permit No. WAR005619 (the "2010 Permit").

Rainier Petroleum has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2002 Permit and the 2010 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its "Colorado Street" facility located at or about 3429 Colorado Avenue South, and 40 South Spokane Street, Seattle, WA 98134 (the

“facility”) as described herein. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Rainier Petroleum.

## **I. COMPLIANCE WITH STANDARDS.**

### **A. Violations of Water Quality Standards.**

Condition S7 of the 2002 Permit and Condition S10.A of the 2010 Permit prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington’s efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency (“EPA”) and Ecology’s determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the “beneficial uses” that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 (“No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter.”). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S7 of the 2002 Permit and Condition S10.A of the 2010 Permit require that Rainier Petroleum’s discharges not cause or contribute to an excursion of Washington State water quality standards.

Rainier Petroleum discharges to the Duwamish River East Waterway. Rainier Petroleum discharges stormwater that contains elevated levels zinc and copper, as indicated in the table of benchmark excursions below. These discharges cause and/or contribute to violations of water quality standards for zinc and copper and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-240, and -260(2). Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1

Quarter in which sample collected	Zn Concentration (Benchmark 117 ug/L)	Cu Concentration (Benchmark 14 ug/L)
4th Quarter 2009	144	
2nd Quarter 2012	302	16.2
3rd Quarter 2013		15.3

## **B. Compliance with Standards.**

Condition S10.C of the 2010 Permit requires Rainier Petroleum to apply all known and reasonable methods of prevention, control and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate SWPPP and best management practices (“BMPs”). Condition S9 of the 2002 Permit contains a substantially similar requirement. Rainier Petroleum has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1, above, and as described below in this notice of intent to sue.

Condition S3.A of the 2002 Permit and Condition S1.A of the 2010 Permit require that all discharges and activities authorized be consistent with the terms and conditions of the permits. Rainier Petroleum has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.**

Condition S9 of the 2002 Permit and Condition S3.A.1 of the 2010 Permit require Rainier Petroleum to develop and implement a SWPPP as specified. Conditions S9 and S9.B.3 of the 2002 Permit and Condition S3.A.2 of the 2010 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Rainier Petroleum has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

Condition S9 of the 2002 Permit and Condition S3.A of the 2010 Permit require Rainier Petroleum to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Rainier Petroleum has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S9 of the 2002 Permit and Condition S3 of the 2010 Permit because it does not adequately describe BMPs. Condition S9.B.3 of the 2002 Permit and Condition S3.B.4 of the 2010 Permit require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S.9.B.3 of the 2002 Permit required that the SWPPP document how stormwater BMPs were selected, the pollutant removal performance expected from the BMP being selected and the technical basis that supports the performance claims for the BMPs being selected and an assessment of how the selected BMP will comply with state water quality standards, satisfy the state AKART requirements, and the federal technology-based treatment requirements under 40 CFR part 125.3. As described by this



subcondition and the second and third prefatory paragraphs of Condition S9 of the 2002 Permit, in lieu of such documentation (“the demonstration approach”), a permittee could choose to follow the stormwater management practices contained in approved stormwater technical manuals (“the presumptive approach”). Condition S9.A.5 of the 2002 Permit directed permittees selecting the presumptive approach to “clearly state which of the approved stormwater technical manuals the BMPs in their SWPPP are based on.” Condition S3.A.3 of the 2010 Permit requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Rainier Petroleum’s SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Rainier Petroleum’s SWPPP fails to satisfy the requirements of Condition S9.B.1.a of the 2002 Permit and Condition S3.B.2 of the 2010 Permit because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

Rainier Petroleum’s SWPPP fails to satisfy the requirements of Condition S9.B.1.b of the 2002 Permit and Condition S3.B.1 of the 2010 Permit because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Rainier Petroleum’s SWPPP fails to comply with Condition S9.B.1.c of the 2002 Permit and Condition S3.B.2.b of the 2010 Permit because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

Rainier Petroleum’s SWPPP does not comply with Condition S9.B.1.d of the 2002 Permit and Condition S3.B.2.c of the 2010 Permit because it does not include an adequate

inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Rainier Petroleum's SWPPP does not comply with Condition S9.B.3.a.i of the 2002 Permit and Condition S3.B.3 of the 2010 Permit because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the 2010 Permit requires that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Rainier Petroleum is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the 2010 Permit.

Rainier Petroleum's SWPPP does not comply with Condition S9.B.3.a of the 2002 Permit and Condition S3.B.4.b.i of the 2010 Permit because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Rainier Petroleum will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

Rainier Petroleum's SWPPP does not comply with Condition S9.A.1 of the 2002 Permit and Condition S3.B.4.b.i.7 of the 2010 Permit because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact

cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Rainier Petroleum's SWPPP does not comply with Condition S9.B.3.b of the 2002 Permit and Condition S3.B.4.b.ii of the 2010 Permit because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Rainier Petroleum's SWPPP does not comply with Condition S9.B.3.c of the 2002 Permit and Condition S3.B.4.b.iii of the 2010 Permit because it does not include treatment BMPs as required.

Rainier Petroleum's SWPPP fails to comply with Condition S9.B.4 of the 2002 Permit and Condition S3.B.4.b.v of the 2010 Permit because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Rainier Petroleum's SWPPP fails to satisfy the requirements of Condition S9.B.2 of the 2002 Permit and Condition S3.B.5 of the 2010 Permit because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

### **III. MONITORING AND REPORTING VIOLATIONS.**

#### **A. Failure to Collect Quarterly Samples.**

Condition S4.A of the 2002 Permit and Condition S4.B of the 2010 Permit require Rainier Petroleum to collect a sample of its stormwater discharge once during every calendar quarter. Condition S4.A of the 2002 Permit required Rainier Petroleum collect such a sample at each distinct point of discharge offsite if activities and site conditions at the facility that may pollute the stormwater are likely to result in discharges that will significantly vary in the concentration or type of pollutants. Conditions S3.B.5.b and S4.B.2.c of the 2010 Permit require Rainier Petroleum to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Rainier Petroleum violated these requirements by failing to collect stormwater samples at any of its discharge points during the first and third quarters 2009, all four quarters of 2010 and 2011, first, third, and fourth quarters 2012, and first, second, and fourth quarters 2013.

Rainier Petroleum has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. These violations have occurred and continue to occur each and every quarter during the last five years that Rainier Petroleum was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until Rainier Petroleum commences monitoring all distinct points of discharge.

**B. Failure to Analyze Quarterly Samples.**

Condition S4.D.2 of the 2002 Permit required Rainier Petroleum to analyze stormwater samples collected quarterly for turbidity, pH, total zinc, and oil and grease. Condition S4.D.3 of the 2002 Permit required Rainier Petroleum to analyze stormwater samples for total copper and total lead following two consecutive quarters of exceedances of the zinc benchmark (117 µg/L), not including intervening quarters during which there was no discharge or no sample. Rainier Petroleum exceeded the zinc benchmark in first and fourth quarters 2008 (discharging 204 µg/L and 215 µg/L zinc, respectively) and was therefore required to analyze subsequent stormwater samples for total copper and total lead.

Rainier Petroleum violated these conditions by failing to analyze stormwater samples as describe in Table 2 below:

Table 2

Sampling Period	Parameters Not Analyzed
1 <sup>st</sup> Quarter 2009	Copper and lead
2 <sup>nd</sup> Quarter 2009	Copper and lead
3 <sup>rd</sup> Quarter 2009	Copper and lead
4 <sup>th</sup> Quarter 2009	Copper and lead

**C. Failure to Timely Submit Discharge Monitoring Reports.**

Condition S9.A of the 2010 Permit requires Rainier Petroleum to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Rainier Petroleum has violated this condition by failing to submit a DMR within the time prescribed for the fourth quarter of 2013.

**D. Failure to Comply with Visual Monitoring Requirements.**

Condition S4.D.1 of the 2002 Permit required Rainier Petroleum to perform quarterly visual monitoring during stormwater sampling. This visual monitoring was to include observations made at sampling locations at the time of sampling; an inspection of stormwater discharges for the presence of floating materials, visible sheen, discoloration, turbidity, and odor; and an assessment of the best management practices required by the permit and the SWPPP. Discharge locations that were not sampled were to be visually inspected at least



annually during a storm event. The visual monitoring and inspections were to be conducted by the personnel specified by the SWPPP, who was to verify that the description of potential pollutant sources was accurate, that the site map required in the SWPPP had been updated or modified to reflect current conditions, and that the controls to reduce pollutants in stormwater discharges were implemented and adequate.

In addition to quarterly visual inspection during storm events, Condition S4.D.1 of the 2002 Permit required Rainier Petroleum conduct at least one dry season (July, August, September) inspection each year and performed by the personnel specified in the SWPPP that occurred after at least seven consecutive days of no precipitation. The dry season inspection was to determine the presence of non-stormwater discharges, which must have been eliminated within thirty days unless authorized by the Permit. The 2002 Permit also required Rainier Petroleum to notify Ecology if non-stormwater discharges were discovered.

The 2002 Permit required that the results of each inspection/visual monitoring event be summarized in an inspection report or checklist and entered into or attached to the SWPPP, and be signed by the person making the observations. Visual monitoring reports were to be reviewed and signed by a duly authorized representative of Rainier Petroleum. Monitoring reports were to include a certification of whether, in the judgment of the person signing the report, Rainier Petroleum was in compliance or non-compliance with the SWPPP and the 2002 Permit, and to identify any incidents of non-compliance. If the site inspection indicated that the requirements of the SWPPP or the Permit were not being met, the 2002 Permit required that the visual inspection report include a summary of the actions that will be taken to meet these requirements.

Condition S7.A of the 2010 Permit requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional of different BMPs are needed).

Condition S7.C of the 2010 Permit requires that Rainier Petroleum record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the 2010 Permit, a summary report and schedule of implementation of the remedial actions that Rainier Petroleum plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and

a certification and signature of the responsible corporate officer or a duly authorized representative.

Rainier Petroleum is in violation of these requirements of Condition S4.D.1 of the 2002 Permit and Condition S7 of the 2010 Permit because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

#### **IV. CORRECTIVE ACTION VIOLATIONS.**

##### **A. Violations of the Level One Requirements of the 2002 Permit.**

Condition S4.C of the 2002 Permit required Rainier Petroleum take specified actions, called a “Level One Response” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2010 Permit requires Rainier Petroleum to implement and applicable Level One Responses required by the 2002 Permit and continue to operator and/or maintain any related BMPs.

As described by Condition S4.C of the 2002 Permit, a Level One Response requires (1) within two weeks of receipt of the sample results, an inspection of the facility, including evaluation of sources of the benchmark parameter, identification of source and operational control methods to reduce stormwater contamination, and evaluation of any warranted changes to the SWPPP; (2) inclusion of a written summary of the inspection results in the SWPPP; (3) an evaluation of the need for structural source control or treatment BMPs; and (4) a summary of the inspection results and remedial actions on the DMR for the quarter during which the benchmark excursion occurred.

Rainier Petroleum has violated the requirements of the 2002 Permit and the 2010 Permit described above by failing to conduct a Level One Response in accordance with permit conditions, including the required inspection, the required implementation of additional BMPs, and the required documentation in the SWPPP and on its DMR each time during 2009 that its quarterly stormwater sampling results were greater than a benchmark, including the benchmark excursions identified in the table in section I.A. of this notice of intent to sue.

##### **B. Violations of the Level One Requirements of the 2010 Permit.**

Condition S8.B of the 2010 Permit requires Rainier Petroleum take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH.

As described by Condition S8.B of the 2010 Permit, a Level One Corrective Action requires Rainier Petroleum: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to

include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the 2010 Permit. Condition S8.B.4 of the 2010 Permit requires Rainier Petroleum implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the 2010 Permit establishes benchmarks including for total copper (14 µg/L) and total zinc (117 µg/L).

Rainier Petroleum has violated the requirements of the 2010 Permit described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark, including the benchmark excursions identified in the table in section I.A. of this notice of intent to sue.

## **V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.**

Condition S9.B of the 2010 Permit requires Rainier Petroleum to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B – D. If a corrective action is not yet completed at the time of submission of the annual report, Rainier Petroleum must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Rainier Petroleum expects to complete corrective actions.

Rainier Petroleum has violated this condition. Rainier Petroleum failed to submit an annual report for 2012 (due May 15, 2013) that describes all of the stormwater problems identified and summarizes a Level 1 corrective action for the second quarter 2012 zinc and copper benchmark exceedances. The annual reports submitted by Rainier Petroleum for 2010 and 2011 (in May 2011) do not include the required information. Specifically, the 2010 report does not describe all of the stormwater problems identified, such as Rainier Petroleum's failure to collect samples of its stormwater discharges. The 2011 annual report similarly fails to describe all of the stormwater problems identified, such as Rainier Petroleum's failure to collect samples of its stormwater discharges.

## **VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.**

### **A. Failure to Record Information.**

Condition S5.C of the 2002 Permit required Rainier Petroleum to record specified information for each sample taken, including the date, exact place, method, and time of sampling or measurement; the individual who performed the sampling or measurement; the dates the analyses were performed; the individual who performed the analyses; the analytical techniques or methods used, and the results of all analyses. Condition S4.B.3 of the 2010 Permit requires Rainier Petroleum record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Rainier Petroleum collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Rainier Petroleum could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Rainier Petroleum is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

#### **B. Failure to Retain Records.**

Condition S5.B of the 2002 Permit required Rainier Petroleum to retain records of all monitoring information, inspection reports, and any other documentation of compliance with permit requirements for a minimum of five years. Condition S9.C of the 2010 Permit requires Rainier Petroleum to retain for a minimum of five years a copy of the 2010 Permit, a copy of Rainier Petroleum's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the 2010 Permit. Upon information and belief, Rainier Petroleum is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

### **VII. REQUEST FOR SWPPP.**

Pursuant to Condition S9.F of the 2010 Permit, Soundkeeper hereby requests that Rainier Petroleum provide a copy of, or access to, its SWPPP for the facility complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Rainier Petroleum fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

### **VIII. CONCLUSION.**



The above-described violations reflect those indicated by the information currently available to Soundkeeper. These violations are ongoing. Soundkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$32,500 per day for each violation before and through January 12, 2009 and up to \$37,500 per day for each violation thereafter. In addition to civil penalties, Soundkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Soundkeeper believes that this Notice of Intent to Sue sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Rainier Petroleum under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

SMITH & LOWNEY, PLLC

By: 

cc: Gina McCarthy, Administrator, U.S. EPA  
Dennis McLerran, Region 10 Administrator, U.S. EPA  
Maia Bellon, Director, Washington Department of Ecology  
CT Corporation System, Registered Agent (505 Union Ave. SE, Ste 120, Olympia, WA 98501)

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
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2009	Precip. (in)	6	0.65	16	0
Mar	sum	7	0.05	17	0
30	0	8	0.06	18	0
31	0.06	9	0	19	0.17
2009	Precip. (in)	10	0	20	0
Apr	sum	11	0.06	21	0
1	0.31	12	0.01	22	0.02
2	0.9	13	0.49	23	0
3	0.15	14	0.19	24	0
4	0	15	0	25	0
5	0	16	0	26	0
6	0	17	0	27	0
7	0	18	0.39	28	0
8	0	19	0.43	29	0
9	0.02	20	0	30	0
10	0.01	21	0	2009	Precip. (in)
11	0.03	22	0	Jul	sum
12	0.68	23	0	1	0
13	0.15	24	0	2	0
14	0	25	0	3	0
15	0	26	0	4	0
16	0	27	0	5	0
17	0.21	28	0	6	0
18	0	29	0	7	0
19	0	30	0	8	0
20	0	31	0	9	0
21	0	2009	Precip. (in)	10	0
22	0.16	Jun	sum	11	0
23	0.05	1	0	12	0.02
24	0	2	0	13	0.04
25	0	3	0	14	0
26	0	4	0	15	0
27	0	5	0	16	0
28	0.06	6	0.01	17	0
29	0.03	7	0	18	0
30	0	8	0	19	0
2009	Precip. (in)	9	0	20	0
May	sum	10	0	21	0
1	0	11	0	22	0
2	0.4	12	0	23	0
3	0.2	13	0	24	0
4	0.35	14	0	25	0
5	0.98	15	0	26	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
27	0	4	0	15	0.07
28	0	5	0.34	16	0.89
29	0	6	0.85	17	1.04
30	0	7	0.06	18	0.08
31	0	8	0.01	19	0
2009	Precip. (in)	9	0	20	0.01
Aug	sum	10	0	21	0.15
1	0	11	0	22	0.02
2	0	12	0	23	0.3
3	0	13	0	24	0
4	0	14	0	25	0.05
5	0	15	0	26	0.97
6	0	16	0.01	27	0.01
7	0	17	0.01	28	0.06
8	0	18	0	29	0.26
9	0	19	0.41	30	0.02
10	0.02	20	0	31	0.28
11	0.32	21	0	2009	Precip. (in)
12	0.04	22	0	Nov	sum
13	0.23	23	0	1	0.06
14	0.01	24	0	2	0.01
15	0	25	0	3	0
16	0	26	0	4	0
17	0	27	0	5	0.07
18	0	28	0.01	6	0.13
19	0	29	0.29	7	1.01
20	0	30	0	8	0.59
21	0	2009	Precip. (in)	9	0.26
22	0	Oct	sum	10	0.35
23	0	1	0.06	11	0.03
24	0	2	0.44	12	0
25	0.01	3	0	13	0.33
26	0	4	0	14	0
27	0	5	0	15	0.17
28	0	6	0	16	0.91
29	0.2	7	0	17	0.52
30	0	8	0	18	0.19
31	0	9	0	19	0.66
2009	Precip. (in)	10	0	20	0.34
Sep	sum	11	0	21	0.43
1	0	12	0	22	0.61
2	0	13	0.18	23	0.04
3	0.09	14	0.56	24	0.06

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
25	0.26	3	0.02	13	0.23
26	0.9	4	0.82	14	0.66
27	0	5	0.09	15	0.04
28	0	6	0	16	0.19
29	0	7	0.03	17	0
30	0	8	0.91	18	0
2009	Precip. (in)	9	0.07	19	0
Dec	sum	10	0.1	20	0
1	0	11	1.03	21	0
2	0	12	0.63	22	0
3	0	13	0.39	23	0.14
4	0.03	14	0.31	24	0.11
5	0	15	0.52	25	0.06
6	0	16	0.02	26	0.49
7	0	17	0.12	27	0.09
8	0	18	0	28	0
9	0	19	0.02	2010	Precip. (in)
10	0	20	0.01	Mar	sum
11	0	21	0	1	0
12	0	22	0	2	0.06
13	0	23	0.01	3	0
14	0.43	24	0.35	4	0
15	0.3	25	0.12	5	0
16	0.46	26	0	6	0
17	0.01	27	0	7	0.05
18	0.03	28	0	8	0.04
19	0.28	29	0.02	9	0
20	0.14	30	0.2	10	0.03
21	0.45	31	0.06	11	0.49
22	0.11	2010	Precip. (in)	12	0.57
23	0	Feb	sum	13	0.01
24	0	1	0.06	14	0
25	0	2	0.02	15	0.01
26	0	3	0.27	16	0.06
27	0	4	0.08	17	0.01
28	0	5	0.08	18	0
29	0.03	6	0.24	19	0
30	0	7	0.09	20	0
31	0.26	8	0	21	0.03
2010	Precip. (in)	9	0	22	0
Jan	sum	10	0.08	23	0
1	0.39	11	0.23	24	0
2	0.05	12	0.43	25	0.43

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
26	0	4	0.44	14	0
27	0	5	0.2	15	0.17
28	0.65	6	0	16	0.22
29	0.83	7	0	17	0
30	0.08	8	0	18	0
31	0.01	9	0	19	0.03
2010	Precip. (in)	10	0.16	20	0.17
Apr	sum	11	0.01	21	0
1	0.08	12	0	22	0
2	0.68	13	0	23	0
3	0.17	14	0	24	0
4	0.08	15	0	25	0
5	0.14	16	0	26	0
6	0	17	0.01	27	0
7	0.11	18	0.18	28	0
8	0.09	19	0.28	29	0
9	0.07	20	0.13	30	0
10	0	21	0.04	2010	Precip. (in)
11	0	22	0.09	Jul	sum
12	0	23	0.18	1	0.02
13	0.08	24	0	2	0.17
14	0	25	0.07	3	0
15	0	26	0.28	4	0.07
16	0.01	27	0.04	5	0
17	0.18	28	0.3	6	0
18	0.01	29	0.04	7	0
19	0	30	0.08	8	0
20	0.01	31	0.22	9	0
21	0.65	2010	Precip. (in)	10	0
22	0	Jun	sum	11	0
23	0.11	1	0.07	12	0
24	0.01	2	0.21	13	0
25	0	3	0.01	14	0
26	0.29	4	0.29	15	0
27	0.29	5	0.04	16	0
28	0.26	6	0.26	17	0
29	0	7	0.06	18	0
30	0.03	8	0.23	19	0
2010	Precip. (in)	9	0.22	20	0
May	sum	10	0.08	21	0
1	0	11	0.01	22	0
2	0.08	12	0	23	0
3	0.09	13	0	24	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
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25	0	2	0	13	0.01
26	0	3	0	14	0.13
27	0	4	0.02	15	0
28	0	5	0	16	0
29	0	6	0.12	17	0
30	0	7	0.01	18	0
31	0	8	0.25	19	0
2010	Precip. (in)	9	0.02	20	0.01
Aug	sum	10	0	21	0.01
1	0	11	0	22	0.13
2	0	12	0	23	0.45
3	0	13	0	24	0.68
4	0	14	0	25	0.41
5	0.04	15	0.21	26	0.17
6	0	16	0.44	27	0
7	0.16	17	0.7	28	0.09
8	0.01	18	0.91	29	0.03
9	0	19	0.63	30	0.41
10	0	20	0	31	0.06
11	0	21	0	2010	Precip. (in)
12	0	22	0	Nov	sum
13	0	23	0.2	1	1.35
14	0	24	0.03	2	0
15	0	25	0	3	0
16	0	26	0.27	4	0
17	0	27	0.04	5	0.07
18	0	28	0.01	6	0.69
19	0	29	0	7	0.03
20	0	30	0	8	0
21	0.01	2010	Precip. (in)	9	0.19
22	0	Oct	sum	10	0
23	0	1	0	11	0.08
24	0	2	0	12	0
25	0	3	0	13	0.12
26	0	4	0	14	0.34
27	0	5	0	15	0.04
28	0	6	0.01	16	0
29	0	7	0	17	0.12
30	0	8	0.08	18	0.14
31	0.37	9	1.01	19	0.08
2010	Precip. (in)	10	0.92	20	0.01
Sep	sum	11	0	21	0
1	0	12	0	22	0.07

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
23	0	1	0	11	0
24	0	2	0	12	0.45
25	0.01	3	0	13	0.28
26	0.39	4	0.03	14	0.84
27	0.01	5	0.11	15	0.15
28	0.05	6	0.28	16	0.04
29	0.09	7	0.52	17	0.02
30	0.69	8	0.01	18	0
2010	Precip. (in)	9	0.03	19	0
Dec	sum	10	0	20	0
1	0	11	0.12	21	0.06
2	0.01	12	0.74	22	0.2
3	0	13	0.66	23	0.08
4	0	14	0.08	24	0.01
5	0	15	0.42	25	0
6	0	16	0.11	26	0
7	0.47	17	0	27	0.51
8	0.74	18	0.08	28	0.22
9	0.99	19	0	2011	Precip. (in)
10	0	20	0.05	Mar	sum
11	1.37	21	0.68	1	0.22
12	2.24	22	0	2	0.14
13	0.34	23	0.04	3	0.35
14	0.57	24	0.26	4	0.12
15	0.09	25	0	5	0
16	0.02	26	0	6	0
17	0	27	0	7	0
18	0.13	28	0.07	8	0.1
19	0.14	29	0.26	9	1.47
20	0.07	30	0	10	0.41
21	0.04	31	0	11	0
22	0.02	2011	Precip. (in)	12	0.47
23	0.43	Feb	sum	13	0.65
24	0.44	1	0	14	0.3
25	0.28	2	0	15	0.43
26	0.24	3	0.02	16	0.22
27	0.46	4	0.06	17	0
28	0	5	0.09	18	0.18
29	0	6	0.11	19	0
30	0	7	0.06	20	0.01
31	0	8	0.01	21	0.01
2011	Precip. (in)	9	0	22	0
Jan	sum	10	0	23	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
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24	0.04	2	0.22	12	0
25	0.11	3	0	13	0.03
26	0.08	4	0	14	0
27	0.19	5	0.04	15	0.11
28	0.11	6	0.12	16	0
29	0.13	7	0.04	17	0
30	0.09	8	0.17	18	0.3
31	0.11	9	0	19	0.03
2011	Precip. (in)	10	0	20	0
Apr	sum	11	0.51	21	0
1	0.85	12	0	22	0
2	0.25	13	0	23	0.01
3	0.07	14	0.52	24	0.12
4	0.12	15	0.69	25	0
5	0.15	16	0	26	0
6	0.1	17	0	27	0
7	0.09	18	0	28	0
8	0	19	0	29	0
9	0	20	0	30	0
10	0.09	21	0.1	2011	Precip. (in)
11	0.04	22	0	Jul	sum
12	0	23	0	1	0
13	0.07	24	0	2	0
14	0.39	25	0.24	3	0
15	0.02	26	0.04	4	0
16	0.15	27	0.09	5	0
17	0	28	0	6	0
18	0.02	29	0	7	0.01
19	0	30	0	8	0
20	0	31	0.06	9	0
21	0.04	2011	Precip. (in)	10	0
22	0	Jun	sum	11	0
23	0	1	0.24	12	0.09
24	0.05	2	0.25	13	0.01
25	0.45	3	0	14	0
26	0.03	4	0	15	0.04
27	0.44	5	0	16	0.33
28	0.04	6	0	17	0.06
29	0.04	7	0.1	18	0
30	0.17	8	0	19	0
2011	Precip. (in)	9	0	20	0
May	sum	10	0	21	0
1	0	11	0	22	0



Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
23	0	Sep	sum	11	0.57
24	0	1	0	12	0.01
25	0.27	2	0	13	0
26	0	3	0	14	0.01
27	0	4	0	15	0
28	0	5	0	16	0
29	0	6	0	17	0
30	0	7	0	18	0
31	0	8	0	19	0
2011	Precip. (in)	9	0	20	0
Aug	sum	10	0	21	0.03
1	0	11	0	22	0.28
2	0	12	0	23	0
3	0	13	0	24	0.02
4	0	14	0	25	0
5	0	15	0	26	0.01
6	0	16	0	27	0
7	0	17	0.21	28	0.38
8	0	18	0.13	29	0
9	0	19	0.06	30	0.14
10	0	20	0	31	0
11	0	21	0	2011	Precip. (in)
12	0	22	0	Nov	sum
13	0	23	0	1	0
14	0	24	0	2	0.42
15	0	25	0.22	3	0
16	0	26	0.32	4	0.06
17	0	27	0.04	5	0
18	0	28	0.01	6	0
19	0	29	0	7	0.01
20	0	30	0.02	8	0
21	0	2011	Precip. (in)	9	0
22	0.08	Oct	sum	10	0
23	0	1	0	11	0.3
24	0	2	0.14	12	0.15
25	0	3	0.09	13	0.09
26	0	4	0.02	14	0
27	0	5	0.1	15	0
28	0	6	0.19	16	0.38
29	0	7	0.05	17	0.1
30	0	8	0.01	18	0.01
31	0	9	0.06	19	0
2011	Precip. (in)	10	0.18	20	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
21	0.42	2012	Precip. (in)	9	0.11
22	1.58	Jan	sum	10	0.09
23	1	1	0	11	0
24	0.35	2	0.48	12	0.04
25	0	3	0.03	13	0.44
26	0.03	4	0.65	14	0.04
27	0.33	5	0.08	15	0
28	0	6	0.04	16	0.04
29	0.05	7	0	17	0.4
30	0	8	0	18	0.18
2011	Precip. (in)	9	0.17	19	0
Dec	sum	10	0.06	20	0
1	0	11	0	21	0
2	0	12	0	22	0.22
3	0	13	0	23	0
4	0	14	0.13	24	0.49
5	0	15	0.23	25	0.01
6	0	16	0.07	26	0
7	0	17	0.09	27	0
8	0	18	0.44	28	0.18
9	0	19	0.32	29	0.08
10	0.01	20	0.39	2012	Precip. (in)
11	0.05	21	0.06	Mar	sum
12	0	22	0.29	1	0
13	0	23	0	2	0.04
14	0.01	24	0.24	3	0
15	0.03	25	0.4	4	0
16	0	26	0.31	5	0.36
17	0	27	0	6	0.05
18	0.08	28	0	7	0
19	0	29	0.67	8	0
20	0	30	0.11	9	0.17
21	0	31	0.04	10	0.46
22	0	2012	Precip. (in)	11	0.31
23	0.01	Feb	sum	12	0.66
24	0.01	1	0.45	13	0.23
25	0.04	2	0	14	0.44
26	0.03	3	0	15	1.07
27	0.03	4	0	16	0.19
28	0.47	5	0	17	0.44
29	0.21	6	0	18	0.08
30	0.02	7	0	19	0.03
31	0	8	0.1	20	0.12

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
21	0	2012	Precip. (in)	9	0.02
22	0.16	May	sum	10	0
23	0	1	0.05	11	0
24	0	2	0	12	0.03
25	0	3	0.78	13	0
26	0	4	0.32	14	0
27	0.21	5	0	15	0
28	0.15	6	0	16	0
29	1.15	7	0	17	0
30	0.08	8	0	18	0.21
31	0	9	0.01	19	0.03
2012	Precip. (in)	10	0	20	0
Apr	sum	11	0	21	0
1	0	12	0	22	0.31
2	0	13	0	23	0.6
3	0	14	0	24	0.01
4	0	15	0	25	0
5	0	16	0	26	0.01
6	0	17	0.47	27	0
7	0	18	0	28	0
8	0	19	0	29	0
9	0	20	0.16	30	0
10	0	21	0.41	2012	Precip. (in)
11	0.08	22	0.12	Jul	sum
12	0	23	0.02	1	0
13	0	24	0.01	2	0
14	0	25	0.05	3	0
15	0	26	0	4	0
16	0.24	27	0	5	0
17	0.07	28	0	6	0
18	0.09	29	0	7	0
19	0.28	30	0.02	8	0
20	0.26	31	0.15	9	0
21	0	2012	Precip. (in)	10	0
22	0	Jun	sum	11	0
23	0	1	0.1	12	0
24	0.03	2	0.02	13	0
25	0.41	3	0	14	0
26	0.16	4	0.03	15	0
27	0.01	5	0.49	16	0
28	0	6	0	17	0
29	0.08	7	0.54	18	0
30	0.26	8	0.05	19	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
20	0.61	30	0	8	0
21	0	31	0	9	0
22	0	2012 Precip. (in)		10	0
23	0	Sep sum		11	0
24	0	1	0	12	0.09
25	0	2	0	13	0.09
26	0	3	0	14	0.52
27	0	4	0	15	0.22
28	0	5	0	16	0
29	0	6	0	17	0
30	0	7	0	18	0.64
31	0	8	0	19	0.1
2012 Precip. (in)		9	0	20	0.18
Aug sum		10	0.02	21	0.14
1	0	11	0	22	0.26
2	0	12	0	23	0
3	0	13	0	24	0.19
4	0	14	0	25	0
5	0	15	0	26	0.06
6	0	16	0	27	0.75
7	0	17	0	28	0.26
8	0	18	0	29	0.57
9	0	19	0	30	1.2
10	0	20	0	31	0.64
11	0	21	0	2012 Precip. (in)	
12	0	22	0.02	Nov sum	
13	0	23	0	1	0.34
14	0	24	0	2	0.19
15	0	25	0	3	0.02
16	0	26	0	4	0.17
17	0	27	0	5	0.05
18	0	28	0	6	0.01
19	0	29	0	7	0
20	0	30	0	8	0
21	0	2012 Precip. (in)		9	0
22	0	Oct sum		10	0
23	0	1	0	11	0.55
24	0	2	0	12	0.13
25	0	3	0	13	0.19
26	0	4	0	14	0
27	0	5	0	15	0
28	0	6	0	16	0.25
29	0	7	0	17	0.2

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
18	0.63	29	0.06	6	0.08
19	2.49	30	0	7	0.09
20	0.22	31	0	8	0
21	0.52	2013	Precip. (in)	9	0.01
22	0.02	Jan	sum	10	0
23	0.95	1	0	11	0.01
24	0	2	0	12	0
25	0	3	0.18	13	0
26	0	4	0.07	14	0.03
27	0	5	0.1	15	0
28	0.12	6	0.03	16	0
29	0.11	7	0.02	17	0
30	1.51	8	0.53	18	0
2012	Precip. (in)	9	1.15	19	0
Dec	sum	10	0	20	0.07
1	0.28	11	0	21	0.01
2	1	12	0	22	0.34
3	0.41	13	0	23	0
4	0.46	14	0	24	0.02
5	0.02	15	0	25	0.14
6	0.07	16	0	26	0.01
7	0.14	17	0	27	0.32
8	0	18	0	28	0.25
9	0.06	19	0	2013	Precip. (in)
10	0	20	0	Mar	sum
11	0.1	21	0	1	0.04
12	0.28	22	0	2	0.21
13	0.08	23	0.21	3	0
14	0.25	24	0.16	4	0
15	0.24	25	0.09	5	0
16	0.92	26	0.16	6	0.61
17	0.11	27	0.01	7	0.26
18	0.05	28	0.21	8	0
19	0.99	29	0.29	9	0
20	0.64	30	0.06	10	0.01
21	0.07	31	0.08	11	0.03
22	0.12	2013	Precip. (in)	12	0.01
23	0.39	Feb	sum	13	0.15
24	0.08	1	0	14	0.05
25	0.41	2	0	15	0
26	0.25	3	0.08	16	0.04
27	0.27	4	0	17	0
28	0	5	0.18	18	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
19	0.37	29	0.15	7	0
20	0.72	30	0	8	0
21	0.1	2013	Precip. (in)	9	0
22	0.01	May	sum	10	0
23	0	1	0	11	0
24	0	2	0	12	0
25	0	3	0	13	0
26	0	4	0	14	0
27	0.01	5	0	15	0
28	0.06	6	0	16	0
29	0.01	7	0	17	0
30	0	8	0	18	0
31	0	9	0	19	0
2013	Precip. (in)	10	0	20	0
Apr	sum	11	0	21	0.01
1	0	12	0.08	22	0
2	0	13	0.11	23	0
3	0	14	0	24	0.01
4	0.41	15	0.03	25	0.01
5	0.44	16	0	26	0.56
6	0.44	17	0.02	27	0.13
7	0.96	18	0	28	0
8	0.04	19	0	29	0
9	0	20	0	30	0
10	0.15	21	0.39	2013	Precip. (in)
11	0.09	22	0.21	Jul	sum
12	0.18	23	0.08	1	0
13	0.31	24	0.02	2	0
14	0.06	25	0	3	0
15	0	26	0.08	4	0
16	0.07	27	0.2	5	0
17	0	28	0.01	6	0
18	0.18	29	0.17	7	0
19	0.67	30	0	8	0
20	0.01	31	0	9	0
21	0.03	2013	Precip. (in)	10	0
22	0	Jun	sum	11	0
23	0	1	0	12	0
24	0	2	0	13	0
25	0	3	0	14	0
26	0	4	0	15	0
27	0	5	0	16	0
28	0.08	6	0	17	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
18	0	28	0	6	0.04
19	0	29	0.38	7	0.1
20	0	30	0	8	0.39
21	0	31	0	9	0
22	0	2013	Precip. (in)	10	0.03
23	0	Sep	sum	11	0.53
24	0	1	0	12	0.06
25	0	2	0	13	0
26	0	3	0.12	14	0.01
27	0	4	0	15	0
28	0	5	0.46	16	0
29	0	6	1.08	17	0.01
30	0	7	0	18	0
31	0	8	0.01	19	0
2013	Precip. (in)	9	0	20	0
Aug	sum	10	0	21	0
1	0	11	0	22	0
2	0	12	0	23	0.01
3	0	13	0	24	0.01
4	0	14	0	25	0
5	0	15	0.21	26	0.01
6	0	16	0	27	0.06
7	0	17	0	28	0
8	0	18	0	29	0
9	0	19	0	30	0.01
10	0	20	0.15	31	0.01
11	0	21	0.01	2013	Precip. (in)
12	0	22	0.37	Nov	sum
13	0	23	0.08	1	0
14	0	24	0.01	2	0.38
15	0	25	0.04	3	0.02
16	0	26	0.01	4	0.01
17	0	27	0.05	5	0.05
18	0	28	1.21	6	0.09
19	0	29	0.62	7	0.94
20	0	30	0.63	8	0
21	0	2013	Precip. (in)	9	0.09
22	0	Oct	sum	10	0
23	0	1	0.08	11	0
24	0	2	0.19	12	0.14
25	0	3	0.02	13	0
26	0	4	0.01	14	0.01
27	0	5	0	15	0.08

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
16	0	27	0.03	4	0
17	0.05	28	0	5	0
18	0.8	29	0	6	0
19	0.11	30	0.02	7	0
20	0	31	0.01	8	0.09
21	0	2014	Precip. (in)	9	0.01
22	0	Jan	sum	10	0.54
23	0.08	1	0.01	11	0.75
24	0	2	0.53	12	0.14
25	0	3	0.03	13	0
26	0	4	0	14	0.41
27	0	5	0	15	0.51
28	0	6	0	16	1.41
29	0.01	7	0.34	17	0.44
30	0.06	8	0.44	18	0.62
2013	Precip. (in)	9	0.09	19	0.02
Dec	sum	10	0.15	20	0.03
1	0.03	11	0.91	21	0.23
2	0.11	12	0.02	22	0.09
3	0.01	13	0.01	23	0.18
4	0	14	0	24	0.39
5	0	15	0	25	0
6	0	16	0	26	0
7	0	17	0	27	0
8	0	18	0	28	0
9	0	19	0	2014	Precip. (in)
10	0	20	0	Mar	sum
11	0	21	0	1	0.01
12	0.22	22	0	2	0.7
13	0.01	23	0	3	0.37
14	0	24	0	4	0.41
15	0.03	25	0	5	1.44
16	0	26	0	6	0.21
17	0	27	0	7	0
18	0.04	28	0.35	8	1.12
19	0	29	0.77	9	0.26
20	0.1	30	0.01	10	0.44
21	0.22	31	0.03	11	0
22	0.21	2014	Precip. (in)	12	0
23	0.01	Feb	sum	13	0
24	0	1	0.02	14	0.11
25	0	2	0	15	0.2
26	0	3	0	16	1.09



Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
17	0.01				
18	0.01				
19	0				
20	0				
21	0				
22	0				
23	0				
24	0				
25	0.22				
26	0.06				
27	0.03				
28	0.51				
29	0.63				
30	0.02				
31	0				